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Counsel for Defendant, Peggy Larez

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,)	No.: 12-00792 YGR
)	
Plaintiff,)	STIPULATION AND PROPOSED
)	ORDER REQUESTING LEAVE TO
v.)	TRAVEL
)	
PEGGY LAREZ, et al.)	Date: August 22, 2013
)	Time: 2:00 p.m.
Defendant.)	Court: Honorable Yvonne Gonzalez Rogers
)	
)	
)	
)	

1. On November 14, 2012, a detention hearing was held and the Court ordered Ms. Larez released to the custody of her mother in Red Bluff, California, with certain conditions, including electronic monitoring and home detention.
2. This Court recently allowed Ms. Larez to move to her daughter's home in Redding, California to escape an abusive living situation.
3. Ms. Larez's birthday is Friday, June 14, 2013, and Ms. Larez would like to have dinner with her daughter, son-in-law, and grandchildren at the Home Town Buffet. The Home Town Buffet is located at 1380 Churn Creek Road, Redding, California.
4. Ms. Larez requests that she be allowed to go to dinner at the Home Town Buffet in Redding on Friday June 14th from 6:30 p.m. to 9:00 p.m.

1 5. The government does not object to Ms. Larez's request that she be allowed to have a
2 birthday dinner. Likewise, pretrial services officer Betty Kim does not object to Ms.
3 Larez's request.
4

5 SO STIUPLATED:

6 Dated: June 12, 2013

-s-

Kathryn Haun,
Assistant United States Attorney

9 Dated: June 12, 2013

-s-

Nicole E. Giacinti,
Attorney for Peggy Larez

11 [PROPOSED] ORDER

12 For the reasons stated above, the Court grants Ms. Larez's request to modify her bail
13 conditions so that she may have dinner on her birthday (June 14) at the Home Town Buffet
14 located at 1380 Churn Creek Road, Redding, California from 6:30 p.m. to 9:00 p.m.
15

16 IT IS SO ORDERED.

18 Dated: 6/12/2013

